

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

Court File No. 17-cv-03058 (SRN/HB)

v.

Lindsey Middlecamp,

Defendant.

Brock Fredin,

Plaintiff,

Court File No. 18-cv-00466 (SRN/HB)

v.

Grace Elizabeth Miller, et al.,

Defendant.

DECLARATION OF K. JON BREYER

I, K. Jon Breyer, declare as follows:

1. I am a Partner with the law firm of Kutak Rock LLP and *pro bono* counsel to Defendants in the above-captioned matters. I submit this affidavit in support of Defendants' Motion for a Temporary Restraining Order and Motion to Declare Plaintiff Brock Fredin a Vexatious Litigant.

2. Attached hereto as **Exhibit 1** is the Order granting Defendant Grace Miller a 50-year HRO.

3. Attached hereto as **Exhibit 2** is the Order granting Defendant Catherine Schaefer a 50-year HRO.

4. Attached hereto as **Exhibit 3** is the 2017 affidavit of Lindsey Middlecamp attaching copies of the websites Plaintiff Brock Fredin created attacking Defendant Schaefer, Defendant Miller, and additional sites attacking Ramsey County District Court Referee Elizabeth Clysdale (who had presided over Middlecamp's HRO proceeding) and attorney Karmen McQuitty (who had represented Defendant Miller in her HRO proceeding).

5. Attached hereto as **Exhibit 4** are select pages of the hearing transcript from the February 14, 2018 evidentiary hearing before Judge Teresa Warner.

6. Attached hereto as **Exhibit 5** are select pages of the hearing transcript from a November 20, 2018 evidentiary hearing before the Ramsey County Court.

7. Attached hereto as **Exhibit 6** are select pages of the March 2, 2020 hearing transcript where Fredin pled the fifth rather than answer questions about the websites.

8. Attached hereto as **Exhibit 7** are copies of 22 websites that between July 2020 and September 2020 Fredin registered and created. Each site contains photographs of the individuals, professional and personal details, and a variety of baseless, inflammatory attacks.

9. Attached hereto as **Exhibit 8** is the October 1, 2018 Order by Ramsey County District Court Judge Diamond finding that a Wisconsin suit commenced by Fredin was

knowingly and intentionally misleading to the Wisconsin court and was designed to communicate with and harass Schaefer.

10. Attached hereto as **Exhibit 9** is Fredin's sanction motion, later denied by the Ramsey County district court, alleging baselessly that Middlecamp was fired from the City of Minneapolis.

11. Attached hereto as **Exhibit 10** is Fredin's reply brief in an appeal to the Minnesota Court of Appeals (A20-0539).

12. Attached hereto as **Exhibit 11** are tweets from Fredin in May of 2018 declaring "Their pro bono representation is next. Dropping some legal bombs on them..." within minutes of referring to Defendant Middlecamp as "autistic" and writing of Defendant Schaefer as someone "no one would drill."

13. Attached hereto as **Exhibit 12** is a tweet from Fredin in September 2019 warning, "Dismiss one of my lawsuits and two shall take its place."

14. Attached hereto as **Exhibit 13** is an April 2018 tweet from Fredin.

15. Attached hereto as **Exhibit 14** is an upload of federal court documents to two public hosting sites, scribd.com and idoc.pub.

16. Attached hereto as **Exhibit 15** is the July 15, 2018 Petition for Writ of Prohibition or Mandamus filed by Fredin in the Minnesota Court of Appeals.

17. Attached hereto as **Exhibit 16** are select transcript pages from a November 20, 2018 evidentiary hearing in Ramsey County District Court.

18. Attached hereto as **Exhibit 17** is a October 8, 2020 email from Fredin admitting that he created a website and youtube video disparaging Defendants' pro bono counsel.

19. Attached hereto as **Exhibit 18** is the May 22, 2018 Order from Ramsey County District Court finding Fredin in contempt in the matter of *Middlecamp v. Fredin*.

20. Attached hereto as **Exhibit 19** is the March 9, 2020 Order from Ramsey County District Court finding Fredin in contempt in the matter of *Middlecamp v. Fredin* and awarding Middlecamp a 50 – year HRO.

I declare under the penalty of perjury that the foregoing is true and correct.
Executed this 12th day of October, 2020 at Minneapolis, Minnesota.

/s/K. Jon Breyer

K. Jon Breyer